

Management System: Safety and Health

Subject Area: Packaging & Transportation Safety
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<h2>Procedure: Approving Contractor Packaging and Transportation Programs</h2>

Issue Date and Revision Number: 10/17/14 0.1	Lead Subject Matter Expert: Tim Marcus	Management System Owner: John Sattler
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1.0 Applicability

This procedure applies to Environmental Management Consolidated Business Center (EMCBC) Subject Matter Expert (SME) performing oversight of Packaging & Transportation (P&T) at Small Sites/Projects. It may also apply to small site/project designated Packaging and Transportation Safety Staff responsible for ensuring compliance with DOE O 460.1C, *Packaging and Transportation Safety*, and DOE O 460.2A, *Departmental Materials Packaging & Transportation Management*, as they relate to review and approval of a contractor prepared Quality Assurance (QA) programs for hazardous material packaging.

Any contractor who participates in the design, fabrication, procurement, use, or maintenance of a hazardous material packaging must have a U.S. Department of Energy (DOE) approved QA program. There are different QA requirements for specific hazardous material packaging types. DOE O 460.1, Section 5.c.(12) requires Field Element/Site Managers to conduct oversight of hazardous materials packaging and transportation activities, including contractor/subcontractor procurement, use and maintenance of authorized packaging, Type A and Type B packaging of radioactive and fissile material for compliance with appropriate regulatory requirements and DOE Orders pursuant to DOE O 226.1A.

In addition, DOE Order 460.2A, Section 4.(f) requires DOE organizations to evaluate contractor/subcontractor transportation and packaging operations at each facility at least every 3 years. Evaluations may be conducted using existing site/facility processes (e.g., facility representatives program reviews, operational readiness reviews, contractor self-assessments, and other safety reviews) or an established transportation and compliance review program. Copies of evaluation reports must be provided to the lead program Secretarial Offices within 45 days of the evaluation.

The Transportation Compliance Assurance Program (TCAP) contains the TCAP checklists that may be used for DOE oversight of small site/project contractors that may not have an evaluation process in place. The TCAP Checklists may be obtained from the Office of Environmental Management WIKI Page at the following address; <http://em-opt.wikidot.com> (Note - setting up an account with User ID and Password is required).

2.0 Required Procedure

Step 1	<p>Small Site Line Management identifies the need to perform a Packaging & Transportation assessment. If in house resources are not available, works with EMCBC (Safety & Quality Division) or EM-33 P&T as follows:</p> <ul style="list-style-type: none"> Contractor P&T programs must be evaluated at least once in a three year cycle.
Step 2	<p>Small Sites Line Management/EMCBC SME determines if the contractor participates in the design, fabrication, procurement, use, or maintenance of certified fissile material packaging (Type A or B) and/or Type B packaging for non-fissile material.</p> <ul style="list-style-type: none"> If yes, go to Step 3 and Step 4, or If no, go to Step 5 through 7.
Step 3	<p>Small Site Line Management/ EMCBC SME coordinate with applicable QA resources (in house/EMCBC/EM etc.) to review the contractor's QA program relating to fissile material packaging and/or Type B packaging procurement, maintenance and use for compliance with the QA requirements in 10 CFR 71, Subpart H.</p> <p>NOTE: QA programs meeting DOE O 414.1D, Change 1, <i>Quality Assurance</i>, and 10 CFR 830 QA requirements will not meet 10 CFR 71, Subpart H, requirements. 10 CFR 71, Subpart H, is essentially NQA-1-1985. Additional guidance on QA programs is available on the RAMPAC Website.</p>
Step 4	<p>Small Site Line Management may coordinate with EMCBC Safety & Quality Division to obtain the approval in writing, of the contractor's QA program as related to Packaging Certification from the Headquarters (HQ) Certifying Official (HCO) in the DOE HQ Office of Environmental Management, (EM-33).</p>
Step 5	<p>Small Site Line Management determines if the contractor participates in the design, fabrication, procurement, use, or maintenance of a hazardous material packaging other than fissile material packaging or Type B packaging. (Note - Typically, all small sites will procure, maintain and use packaging.)</p>
Step 6	<p>Small Site Line Management coordinates with Onsite QA staff or EMCBC Safety & Quality Division staff to review and asses the contractor's Packaging & Transportation program relating to the hazardous material packaging procurement, maintenance and use for compliance with the QA requirements DOE O 414.1D and</p>

	DOE O 460.2A. NOTE: See the Transportation Compliance Assistance Program Management Plan (2/28/2011) for Checklists that aid in the evaluation of Packaging & Transportation.
Step 7	Small Site Line Management, in coordination with Site Office or EMCBC Safety and Quality Division QA staff work to obtain the Small Site Office approval in writing, of the contractor's QA program (NOTE - If required by contract).
Step 8	File records developed as a result of the assessment in accordance with Section 4.0 below.

3.0 References

- 10 CFR 71, Subpart H, *Quality Assurance*
- 10 CFR 830, *Nuclear Safety Management*
- DOE O 414.1D, *Quality Assurance*
- DOE G 460.1-1, *Implementation Guide for Use with DOE O 460.1A, Packaging and Transportation Safety, and Attachments*
- DOE O 460.1C, *Packaging and Transportation Safety*
- DOE O 460.2A, *Departmental Materials Packaging & Transportation Management*
- NQA-1-1985, *ASME Nuclear Quality Assurance*
- RAMPAC (*Radioactive Material Packaging*) Web Site
- Memorandum, EM DAS for Safety Management & Operations, Transportation Compliance Reviews dated 3/25/2009
- Transportation Compliance Assistance Program Management Plan (2/28/2011)
 - Checklist 1, Transportation and Packaging Quality Assurance
 - Checklist 2, Hazardous and Radioactive Materials Packaging
 - Checklist 3, Hazardous & Radioactive Materials Shipper
 - Checklist 4, Contractor Motor Carrier Operations
 - Checklist 5, Onsite Railroad Operations
 - Checklist 6, Transportation Emergency Response
 - Checklist 7, Hazardous Materials Employee Training
 - Checklist 8, Transportation Security

4.0 Records

Records generated through implementation of this procedure are identified as follows and are maintained by the Small Site/Project Office in accordance with their organizational file plan or if the EMCBC is the generator, in accordance with the Office of Technical Support & Asset Management Organizational File Plan as identified below:

Records Category Code	Records Title	Responsible Organization	Quality Assurance Classification (Lifetime, Non-Permanent or N/A)
ADM 22-02-B1	Audit/Investigation Files – Case Files – Transportation Compliance Assurance Reports	Project/Site Office or Office of Technical Support & Asset Management	Non-Permanent

EMCBC RECORD OF REVISION

DOCUMENT TITLE: Approving Contractor Packaging and Transportation Programs

If there are changes to the controlled document before the two-year review cycle, the revision number stays the same; one of the following will indicate the change:

I Placing a vertical black line in the left margin adjacent to sentence or paragraph that was revised; or

I Placing the words GENERAL REVISION at the beginning of the text. This statement is used when entire sections of the document are revised.

If changes and updates occur at the two-year review cycle, the revision number increases by one.

Rev. No.	Description of Changes	Revision on Pages	Date
0	Initial format	All	08/03/12
0.1	Added document number SAP-OTSAM-460-01. Revised P&T wiki page reference, removed link, corrected DOE O 414 reference, added Project Sites as location for records.	All	10/17/14